

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

GPI, LLC, Plaintiff, v. PATRIOT GOOSE CONTROL INC. and ELLIOT OREN, Defendants.	Case No. 1:23-cv-02360
--	------------------------

PLAINTIFF GPI LLC's MOTION TO EXPEDITE DISCOVERY

Plaintiff GPI, LLC ("GPI"), by and through its undersigned counsel, files the following Motion to Expedite Discovery pursuant to the Federal Rules of Civil Procedure, and in support thereof, states as follows:

1. By its Verified Complaint filed on August 29, 2023, Plaintiff seeks a preliminary injunction, permanent injunctive relief and monetary damages against its former franchisee, Patriot Goose Control Inc. ("PGC") and its president, treasury, secretary, and sole director Elliot Oren ("Oren") for post-term obligations under the relevant Franchise Agreement and violations of the Lanham Act, 28 U.S.C. § 1338.

2. Concurrently with this Motion, Plaintiff has filed a Motion for Preliminary Injunction.

3. To fully and adequately prepare for any hearing regarding Plaintiff's Motion for Preliminary Injunction and/or the disposition of the Motion for Preliminary Injunction, it is necessary that certain discovery, by way of production of documents, electronically stored

information, and other written discovery, be scheduled and completed before the date of such hearing.

4. To complete this discovery before the preliminary injunction hearing, the time periods for discovery set forth in the Federal Rules of Civil Procedure should be shortened and expedited. For the convenience of the Court, copies of the following are attached hereto:

- Plaintiff's First Request for Production of Documents Directed to PGC and Elliot Oren (**Exhibit A**); and
- Plaintiff's Notice of Deposition Directed to PGC Pursuant to Federal Rule of Civil Procedure 30(b)(6) (**Exhibit B**).

5. The information sought by GPI is reasonable in scope, is not in GPI's possession, and cannot be ascertained without discovery.

6. The imminence and severity of irreparable harm to GPI and the interests of justice require that the time periods for discovery be shortened and expedited by this Court. "The Federal Rules of Civil Procedure allow courts to order expedited discovery in the form of document requests and depositions." *IOMAXIS, LLC v. Hurysh*, No. CV 20-3612 PJM, 2022 WL 180734, at *4 (D. Md. Jan. 20, 2022). As is the case here, "[e]xpedited discovery is particularly appropriate where a preliminary injunction is sought." *Id.* (citing *Ciena Corp. v. Jarrard*, 203 F.3d 312, 324 (4th Cir. 2000) (remanding with instructions to the lower court to provide the defendant with an opportunity to conduct expedited discovery in order to file a motion to dissolve a preliminary injunction)).

WHEREFORE, GPI requests this Court to enter an Order in the form attached hereto expediting discovery in this matter.

Dated: August 29, 2023

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

/s/ Gretchen L. Jankowski

Gretchen L. Jankowski (MD Fed. Bar No. 19473)

Matthew C. Pilsner (*pro hac vice motion forthcoming*)

Union Trust Building

501 Grant Street, Suite 200

Pittsburgh, PA 15219

412-562-8800 (o)

412-562-1041 (f)

gretchen.jankowski@bipc.com

matthew.pilsner@bipc.com

Karima Tawfik (MD Fed. Bar No. 30624)

1700 K Street, NW, Suite 300

Washington, D.C. 20006

202-452-7996 (o)

202-452-7989 (f)

karima.tawfik@bipc.com

Attorneys for GPI, LLC

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of August 2023, the foregoing document was sent to the process server for personal service upon Defendants at the following address:

Patriot Goose Control, Inc.
c/o Elliot Oren, President
824 The Old Station Court
Woodbine, MD 21797

Elliot Oren, Individually
824 The Old Station Court
Woodbine, MD 21797

I also certify that a courtesy copy of the foregoing was served upon Craig E. Yaris, Esq.
by e-mail:

Craig E. Yaris, Esq.
Holon Law Partners
cyaris@holonlaw.com

*Attorneys for Defendants Patriot Goose Control Inc. and
Elliot Oren*

BUCHANAN INGERSOLL & ROONEY PC

/s/ Gretchen L. Jankowski _____
Gretchen L. Jankowski, Esq.

Counsel for Plaintiff GPI, LLC